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Attorneys for Plaintiffs
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UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

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EILEEN RODRIGUEZ
LATEESHA AMONS

Plaintiffs,

vs.

CASE NO. 08-2376(JLL)

MASTER CARS USA, INC.,
MASTERS MOTOR SPORTS,
ARMIN BARATIAN,
MARK B., SHAWN, JACK,
NORMAN, HSBC AUTO FINANCE
and JOHN DOE 1-10, XYZ, INC 1-10,
ten names being fictitious and
unknown to the plaintiffs, the person
or parties intended being the persons
or parties, if any,
Defendants.

**AFFIRMATION FOR JUDGMENT
BY DEFAULT**

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STATE OF NEW JERSEY) ss.:

COUNTY OF BERGEN)

Shmuel Klein, attorney for Plaintiffs affirms under the penalties of perjury and says:

1. I am associated with the firm of Law Offices of Shmuel Klein, PC, attorneys for plaintiffs in the above-entitled action and I am familiar with all the facts and circumstances in this action.

2. I make this affirmation pursuant to the Court's Order by the Honorable Judge Linares, dated June 23, 2008 and pursuant to Rule 55 of the Federal Rules of Civil procedure, in support of plaintiffs' application for the entry of a default judgment against defendant Master Cars USA, Inc.

3. Plaintiffs certify that defendant is a corporate entity, and as such Defendant is not an individual serving in the military, an infant or an incompetent person.

3. This is an action to recover \$214,699.76 owed by defendant to plaintiff for violations of the Truth in Lending Act, violation of the New Jersey Consumer Fraud Act, violation of the Credit Repair Organization Act, common law fraud, negligent misrepresentation, negligence, breach of contract, and infliction of emotional distress.

5. This action was commenced on May 15, 2008 by the filing of the summons and complaint. A copy of the summons and complaint was served on the defendant on May 29, 2008 by serving the Secretary of State of New York.

6. Defendant did not answer the Complaint and the time to answer has now expired.

7. Defendant failed to replace counsel. Defendant failed to answer Plaintiff's interrogatories and requests for production of documents. Defendants failed to provide Plaintiff with its rule 26 initial disclosures.

8. On June 23, 2008, the Honorable Judge Linares Ordered that Plaintiff seek default against Defendant Master Cars USA, Inc.

9. The disbursements sought to be taxed have been made in this action or will necessarily be made herein.

WHEREFORE, plaintiff requests the entry of Default and the entry of the annexed Judgment against defendant.

Dated: Mahwah, New Jersey
June 30, 2008

_____/s/_____
Shmuel Klein